

# CATALANO LAW

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February 11, 2022

The Honorable Sharon A. King, Magistrate Judge  
United States District Court, District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> and Cooper Streets  
Room 1050  
Camden, NJ 08101

Re: Frank Piccioni v. Chick fil A, et al. - Case No.: 1:20-cv-16079  
Shawn O'Toole v. Chick fil A, et al. - Case No.: 1:20-cv-16076  
Leah Ala v. Chick fil A, et al. - Case No.: 1:20-cv-16064

Dear Judge King:

I hope this letter finds Your Honor doing well. I am herein providing Your Honor with the status of our settlement negotiations on these three (3) consolidated cases pursuant to the Court's Text Order of January 31, 2022.

We are all talking and continue to make progress in our joint efforts to resolve these cases. Kevin McKeon on behalf of Strategic has a conference call scheduled with his client today. We are hoping to know more after that.

As a result, we are respectfully requesting another week within which to continue to negotiate with an eye toward a global resolution. We would also ask that the matter remain "Administratively Terminated" until further notice from counsel.

I am also pleased to inform the court that I was able to resolve all three (3) Workers Compensation claims yesterday on a Section 20 basis, meaning that those settlement amounts will not have to be reimbursed from any settlements in these third-party cases. This should make it somewhat easier to resolve these matters.

We will report back to Your Honor as soon as we have more information to provide. In the interim, we would like to express our thanks for your indulgence in this regard.

Respectfully,  


Randy P. Catalano

Cc: Kyle Everly, Esquire  
Kevin McKeon, Esquire